

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO**

IN RE:)	BANKRUPTCY CASE NO. 24-53530
)	
Leo Neal Jr.)	
)	
DEBTORS)	CHAPTER 13
)	
)	JUDGE MINA NAMI KHORRAMI

MOTION TO WITHDRAW AS COUNSEL

Now comes Counsel for the Debtor, pursuant to LBR 2091-1 (a)(2), and hereby moves the Court for an Order granting her leave to withdraw as Counsel for the Debtor. Counsel's reasons are set forth more fully in the Memorandum in Support below.

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Respectfully,

/s/ Karen E. Hamilton
Karen E. Hamilton (0064808)
Attorney for Debtor
2025 S High Street, Suite 1
Columbus, Ohio 43207
614 443-7920 phone
614 443-7922 fax

karen@karenhamiltonlaw.net

MEMORANDUM IN SUPPORT

This is the Debtor's third Chapter 13 case filed with this Court. The first case was filed January 14th 2022; the second case was filed April 27th 2022 and the case at bar was filed September 4th 2024. The case at bar was confirmed on February 25, 2025 and the Debtor is current in the plan payments.

The Debtor has not responded to phone calls or emails requesting he meet with counsel to property continue in his representation. This lack of communication has made it impossible to properly represent the Debtor. Furthermore there are irreconcilable

conflicts regarding how the case should be handled, Counsel does not believe she can zealously represent the Debtor in this matter; and that our communication issue has created an irreconcilable relationship that would not benefit the Debtor to continue in my representation.

While counsel hesitates to withdraw for any case, irreconcilable differences have arisen that prevent effective representation. Under these facts, it is best for all parties involved to part ways and allow the Debtor to choose other counsel, or proceed pro se.

Wherefore, based on the foregoing, Counsel believes that good cause exists to warrant the issuance of an Order removing her as Counsel from the Case, and from further representation of the Debtor

Respectfully,

/s/ Karen E. Hamilton

Karen E. Hamilton (0064808)
Attorney for Debtor
2025 S. High Street, Suite 1
Columbus, Ohio 43207
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CERTIFICATE OF SERVICE AND
NOTICE OF RIGHT TO RESPOND WITHIN 21 DAYS

Karen E Hamilton, counsel for Debtor, Leo Neal Jr., has filed papers with the court to obtain an order to withdraw as Counsel

Your rights may be affected.

You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion/objection, then on or before **twenty - one (21) days from the date set forth in the certificate of service for the motion/objection**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to:

170 North High Street, Columbus, Ohio 43215

OR your attorney must file a response using the court's ECF System.
The court must **receive** your response on or before the date above.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:
Karen E. Hamilton, 2025 S High Street, Suite 1, Columbus, Ohio 43207
Office of the U.S. Trustee, 170 North High Street, Suite 200, Columbus, Ohio 43215

If you or your attorney do not take these steps, the court may decide to enter an order granting the relief requested.

Dated: April 25th, 2025

I hereby certify that on April 25th, 2025, a copy of the foregoing MOTION TO WITHDRAW AS COUNSEL was served on the following registered ECF participants, electronically through the court's ECF System at the email address registered with the court:

To the following by ordinary U.S. Mail addressed to:

Leo Neal Jr.
5174 Schuykill Street
Columbus, Ohio 43220

/s/ Karen E. Hamilton
Karen E. Hamilton 0064808
2025 S High Street
Suite 1
Columbus, Ohio 43207
614 443-7920
614 443-7922 fax
karen@karenhamiltonlaw.net